REMARKS

Claims 6-25 have been amended. Claims 6-25 remain for further consideration. No new matter has been added.

The objections and rejections shall be taken up in the order presented in the Official Action.

3-19. Claims 6-25 currently stand rejected for allegedly being obvious in view of Applicant's Admitted Prior Art (AAPA) and U.S. Patent 6,246,688 to Angwin et al. (hereinafter "Angwin").

Claim 6

The Official Action cites a definition for the term "proxy" from the Microsoft Press Dictionary, as set forth on page 6 of the Official Action. The Official Action contends *"since in context of the specification as aforesaid, the so-called 'proxy' neither is the one to manage Internet traffic, the API and the first device is the unit that manages traffic (see Spec page 13 and 15). Throughout the specification does not suggest any caching content related nor required access control to each particular unit".* The Official Action then alleges *"[b]eside of the access control were needed, should it be more appropriated to install this feature at the first unit, which equipped with the API. Therefore, examiner convinces that the term proxy, in context of the claim and the original specification, does not intend to be used as conventional meaning of proxy, or acting as a firewall."*(Official Action, p. 6-7). It is respectfully submitted that the understanding set forth in the Official Action of the claimed invention is incorrect. The term "proxy computer" as used in the claims is consistent with the conventional meaning of the term proxy computer.

The term "proxy computer" as used in the claims is consistent with the definition from the Microsoft Press Dictionary. For example, the network configuration as illustrated in Figure 1 of the present application is such that if a network unit such as unit 105 makes a request for an Internet page, then the request must go via either first adjacent unit 104 or second adjacent unit 106.

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Therefore, since the units 104 and 106 each have a proxy computer as claimed, both units can perform the known proxy function of *"managing Internet traffic to and from a local area network and can provide other features, such as document caching and access control."* (Microsoft Press Dictionary, see pg. 6 of the Official Action). The configuration of the claimed invention reduces the number of requests to the Internet, since the page requested by a unit may be cached in the proxy of one of the other units. Therefore, the applicant respectfully submits that the statement in the Official Action *"[t]herefore, examiner convinces that the term proxy, on context of the claim and the original specification, does not intend to be used as conventional meaning of proxy, or acting as a firewall."* (Official Action, pg. 7) is factually incorrect.

Claim 6 has been amended to more particularly recite that the claimed network comprises:

> "a communication path communicably <u>linking the plurality of network units in a peer-to-peer point-to-point configuration</u>; and
> where a first network unit of the plurality of network units has installed a network layer of a second network in combination with an associated application program interface, and where a proxy computer is installed in each of the plurality of network units other than the first network unit." (emphasis added, cl. 6).

Support for the feature "peer-to-peer point-to-point" is found in the arrangement of the units illustrated in the figures, and since the network is preferably configured as a MOST network. The arrangement in FIG. 1 of the present invention illustrates the plurality of network units arranged in a peer-to-peer point-to-point configuration. Within the peer-to-peer point-to-point configuration of the units, placing a proxy computer in each of the plurality of network units other than the first network unit is NOT inconsistent with the conventional definition of proxy set forth in the Official Action. As set forth above, the configuration of claim 6 reduces the number of requests to the Internet, since the internet page requested by a unit may be cached in the proxy of one of the other units, thus reducing the need access the Internet in order to satisfy the request.

The Official Action contends *"the aforementioned devices do not require any security feature of firewall, since their content is unchangeable and for entertainment purposes only, rather they,*

perhaps need a computer interface or computerized control capability." (Official Action, p. 5). As understood, the foregoing statement from the Official Action is wholly incorrect. Specifically, the contention in the Official Action that the units do not require any security feature of firewall (e.g., requiring a proxy) is inconsistent with the claimed invention. As known, the **claimed invention** as a whole must be considered.

A review of the large index of the MOST Specification, Revision 2.2 dated November 11, 2002 fails to reveal index to the term "proxy" or proxy in combination with other terms with the index. Accordingly, given the expansive index set forth in the MOST Specification, if proxy is an inherent feature of MOST as suggested in the Official Action, then it is more than reasonable to expect a listing containing the term proxy in the index of the MOST Specification. However, the fact that the term proxy is NOT in the index of the lengthy MOST Specification strongly suggests that the conclusionary and unsupported contentions in the Official Action that the proxy is inherently part of MOST is incorrect.

The statement in the Official action that *"[t]herefore, examiner convinces that the term proxy, in context of the invention and the original specification, does not intend to be used as conventional meaning of proxy, or acting as a firewall.*" (Official Action, pgs 6-7). Again, this statement is factually incorrect and not based upon a fair and proper reading of the claimed invention. This is even more so in view of the claimed invention which has been amended to more particularly recite that the network units are arranged in a peer-to-peer point-to-point configuration. Accordingly, for at least the reasons set forth, it is respectfully submitted that the combined teachings of AAPA and Angwin are incapable of rendering the subject matter of claim 6 obvious. A fair and proper reading of AAPA and Angwin reveals that there is simply no structure disclosed in the combined teachings that performs the function of a proxy server *"... installed in each of the plurality of network units other than said first network unit.*" (cl. 1).

Claim 18

Claim 18 recites a network that comprises a plurality of network units including a first network unit and a plurality of remaining network units communicably linked in a peer-to-peer point-to-point network configuration via a communication path. Each of the plurality of remaining network units includes an associated proxy computer. As set forth above with respect to claim 6, the combined teachings of AAPA and Angwin fails to either disclose or suggest a plurality of remaining network units that each include an associated proxy computer.
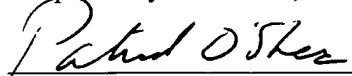
Claim 25

Claim 25 recites a vehicle-hosted multimedia system for providing the capability to communicate over the Internet. The multimedia system includes a plurality of network units connected in a peer-to-peer point-to-point network configuration. The plurality of network units includes *"a plurality of network units other than the telephone, each comprising a proxy computer."* (cl. 25). As set forth above, the combined teachings of AAPA and Angwin fails to disclose or suggest such a plurality of network units each including a proxy computer.

For all the foregoing reasons, reconsideration and allowance of claims 6-25 is respectfully requested.

If a telephone interview could assist in the prosecution of this application, please call the undersigned attorney.

Respectfully submitted,

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